

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

CR222-0026

UNITED STATES OF AMERICA)	INDICTMENT NO.
)	
v.)	FILED UNDER SEAL
)	
DAVID E. ALVAREZ,)	21 U.S.C. § 846
GARRISON A. BELL,)	Conspiracy to Possess with
DESIREE M. BRILEY,)	Intent to Distribute and to
RACHAEL P. BYRD,)	Distribute a Controlled
a/k/a "Byrd is the Word,")	Substance
a/k/a "Rachael NeSmith,")	
TERRY L. CASON, II,)	18 U.S.C. § 924(0)
TONYA C. COX,)	Conspiracy to Possess
a/k/a "Shuge White,")	Firearms in Furtherance of
ABRAHAM CREWS,)	Drug Trafficking Crime
a/k/a "Abe,")	
HANNAH G. CROFT,)	21 U.S.C. § 841(a)(1)
MICHAEL S. DANIELS,)	Possession of Controlled
MARISSA D. DAVIS,)	Substance with Intent to
WILLIE H. DAY,)	Distribute/Distribution of a
ASHLEY DEEN,)	Controlled Substance
CODY M. DEMERS,)	
a/k/a "Bravo Seven,")	18 U.S.C. § 922(g)
SKYLER T. DRAWDY,)	Possession of a Firearm and
TAYLOR D. DREW,)	Ammunition by Prohibited
JOSHUA A. DRURY,)	Person
JONATHAN R. ELROD,)	
a/k/a "Brazy Jay,")	18 U.S.C. § 922(d)
a/k/a "Jay,")	Transferring Firearm to
a/k/a "John Boy,")	Prohibited Person
JOSHUA E. ENKE,)	
JUAN C. EVERETTE,)	26 U.S.C. § 5861(d)
a/k/a "Don Juan,")	Receipt or Possession of
ANDREW R. FLANAGAN,)	Unregistered Firearm
a/k/a "Drew,")	
VERDALEE D. FLANAGAN,)	18 U.S.C. 924(c)
a/k/a "Verlee,")	Possession of a Firearm in
ALEXA B. FOSTER,)	Furtherance of Drug
a/k/a "Lexa,")	Trafficking Crime
THEODORE GEE,)	
a/k/a "Keno,")	
CHAD L. GOOGE,)	

FILED
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SOUTHERN DISTRICT OF GEORGIA

SHAWN S. GREEN,)
a/k/a "Polo Green,")
LAURA R. HARDEN,)
JOHN E. HARRISON,)
a/k/a "Johnny,")
PRISCILLA HEMINGWAY,)
a/k/a "Priscilla Carr,")
WYNDEL L. HERNDON,)
BRITNEE V. HOUSTON,)
TIMOTHY W. HUTCHINSON,)
a/k/a "Tim,")
KENNETH W. LANE,)
a/k/a "Skinny,")
TIMOTHY W. LOPER,)
KENNETH MAINOR,)
a/k/a "Busta Bill,")
KENYETTA D. MAINOR,)
a/k/a "Yatta,")
WINDELL MCCLAIN,)
CAMEREN A. MCDONALD,)
JUSTIN W. MCGHEE,)
CHARLIE A. MOODY,)
ANTONIO MORALES,)
a/k/a "Silence,")
a/k/a "Silent Ololade,")
AUBREY NESMITH,)
JAMES D. NESMITH,)
a/k/a "DG,")
MARY NESMITH,)
ERIC S. OGDEN,)
a/k/a "Scotty,")
AUSTON J. PROCTOR,)
MICHAEL A. PROVENZANO,)
JIMMY A. REYNOLDS,)
a/k/a "Jim,")
JAMES C. RICHARDSON,)
WILLIAM M. RINGLE,)
a/k/a "Will,")
ANTHONY D. RUFFNER,)
SAMANTHA S. RUSSELL,)
JAMEY E. SAPP,)
BLAKE K. SCREEN,)
JOHN D. SCREEN,)
ADAM H. SMITH,)

BRIAN T. SPELL,)
GREGORY W. STABILE,)
a/k/a "G,")
a/k/a "Lts Be DAreason,")
JAMES I. STEPHENS,)
a/k/a "Rabbit,")
DEBRA L. STOKES,)
a/k/a "Debbie,")
STEPHANIE L. STOVER,)
JASON A. SWEAT,)
CLINTON TAYLOR,)
CORI L. TAYLOR,)
LARRY B. TAYLOR,)
a/k/a "Lee Lee,")
CHRISTOPHER J. THOMPSON,)
RONALD E. THOMPSON,)
a/k/a "E.,")
a/k/a "3D,")
JESSE J. TRUJILLO,)
CHARLES W. WALRATH,)
a/k/a "Boomer,")
DAYTON P. WHATLEY,)
DAVID NICHOLAS WHEELER,)
DAKOTA L. WHITE,)
JAMES D. WIGGINS,)
a/k/a "Brad Jones,")
JEREMY D. WIX,)
HEAVEN L. WOLFE,)
JOSHUA T. WOLFE,)
a/k/a "White Boy,")
a/k/a "Tom Walier," and,)
DAVID D. YOUNG,)
a/k/a "Khaos,")

THE GRAND JURY CHARGES THAT:

COUNT ONE

*Conspiracy to Possess with Intent to Distribute and to
Distribute a Controlled Substance
21 U.S.C. § 846*

Beginning on a date at least as early as January of 2020, up to and including
the return date of this indictment, the precise dates being unknown, in Glynn, Pierce,

Camden, Wayne, Treutlen, McIntosh, Toombs, Telfair, Dodge, Ware Counties, and others within the Southern District of Georgia, and elsewhere, the defendants,

DAVID E. ALVAREZ,
GARRISON A. BELL,
DESIREE M. BRILEY,
RACHAEL P. BYRD,
a/k/a "Byrd is the Word,"
a/k/a "Rachael NeSmith,"
TERRY L. CASON, II,
TONYA C. COX,
a/k/a Shuge White,"
ABRAHAM CREWS,
a/k/a "Abe,"
HANNAH G. CROFT,
MICHAEL S. DANIELS,
MARISSA D. DAVIS,
WILLIE H. DAY,
ASHLEY DEEN,
CODY M. DEMERS,
a/k/a "Bravo Seven,"
SKYLER T. DRAWDY,
TAYLOR D. DREW,
JOSHUA A. DRURY,
JONATHAN R. ELROD,
a/k/a "Brazy Jay,"
a/k/a "Jay,"
a/k/a "John Boy,"
JOSHUA E. ENKE,
JUAN C. EVERETTE,
a/k/a "Don Juan,"
ANDREW R. FLANAGAN,
a/k/a "Drew,"
VERDALEE D. FLANAGAN,
a/k/a "Verlee,"
ALEXA B. FOSTER,
a/k/a "Lexa,"
THEODORE GEE,
a/k/a "Keno,"
CHAD L. GOOGE,
SHAWN S. GREEN,
a/k/a "Polo Green,"
LAURA R. HARDEN,
JOHN E. HARRISON,

a/k/a "Johnny,"
PRISCILLA HEMINGWAY,
a/k/a "Priscilla Carr,"
WYNDEL L. HERNDON,
BRITNEE V. HOUSTON,
TIMOTHY W. HUTCHINSON,
a/k/a "Tim,"
KENNETH W. LANE,
a/k/a "Skinny,"
TIMOTHY W. LOPER,
KENNETH MAINOR,
a/k/a "Busta Bill,"
KENYETTA D. MAINOR,
a/k/a "Yatta,"
WINDELL MCCLAIN,
CAMEREN A. MCDONALD,
JUSTIN W. MCGHEE,
CHARLIE A. MOODY,
ANTONIO MORALES,
a/k/a "Silence,"
a/k/a "Silent Ololade,"
AUBREY NESMITH,
JAMES D. NESMITH,
a/k/a "DG,"
MARY NESMITH,
ERIC S. OGDEN,
a/k/a "Scotty,"
AUSTON J. PROCTOR,
MICHAEL A. PROVENZANO,
JIMMY A. REYNOLDS,
a/k/a "Jim,"
JAMES C. RICHARDSON,
WILLIAM M. RINGLE,
a/k/a "Will,"
ANTHONY D. RUFFNER,
SAMANTHA S. RUSSELL,
JAMEY E. SAPP,
BLAKE K. SCREEN,
JOHN D. SCREEN,
ADAM H. SMITH,
BRIAN T. SPELL,
GREGORY W. STABILE,
a/k/a "G,"
a/k/a "Lts Be DAreason,"

JAMES I. STEPHENS,
a/k/a "Rabbit,"
DEBRA L. STOKES,
a/k/a "Debbie,"
STEPHANIE L. STOVER,
JASON A. SWEAT,
CLINTON TAYLOR,
CORI L. TAYLOR,
LARRY B. TAYLOR,
a/k/a "Lee Lee,"
CHRISTOPHER J. THOMPSON,
RONALD E. THOMPSON,
a/k/a "E.,"
a/k/a "3D,"
JESSE J. TRUJILLO,
CHARLES W. WALRATH,
a/k/a "Boomer,"
DAYTON P. WHATLEY,
DAVID NICHOLAS WHEELER,
DAKOTA L. WHITE,
JAMES D. WIGGINS,
a/k/a "Brad Jones,"
JEREMY D. WIX,
HEAVEN L. WOLFE,
JOSHUA T. WOLFE,
a/k/a "White Boy,"
a/k/a "Tom Walier," and,
DAVID D. YOUNG,
a/k/a "Khaos,"

aided and abetted by each other and by others known and unknown, with some joining the conspiracy earlier and others joining later, did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with others known and unknown, to possess with intent to distribute and to distribute 50 grams or more of methamphetamine, a mixture and substance containing a detectable amount of fentanyl, both Schedule II controlled substances, a mixture and substance containing a detectable amount of heroin, a Schedule I

controlled substance, and a quantity of alprazolam (Xanax), a Schedule IV controlled substance.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to possess with intent to distribute and to distribute controlled substances in the Southern District of Georgia and elsewhere for financial gain, or profit, or status.

MANNER AND MEANS OF THE CONSPIRACY

It was part of the conspiracy for one or more members of the conspiracy to agree:

- a. to serve in different roles in the conspiracy;
- b. to associate with the Ghost Face Gangsters, the Gangster Disciples, the Bloods, the Aryan Brotherhood, and other criminal organizations to aid in the distribution of controlled substances, for protection, and to promote a climate of fear;
- c. to recruit other conspirators and to plan operations while confined at a Georgia Department of Correction Facility;
- d. to use cell phones, Facebook Messenger, and other communication facilities to coordinate drug shipments and drug distribution;
- e. to use correctional officers to smuggle drugs and contraband into Georgia correctional facilities;
- f. to possess and trade firearms as tools of the drug trade to protect themselves, the drugs, and the proceeds made from the illegal drug distribution, and to retaliate against perceived threats against the organization;

g. to engage in violent acts to retaliate against threats to the drug trafficking organization;

h. to use coded language to facilitate the drug trafficking operation;

i. to keep other conspirators informed of activities, plan future transactions and share information about drug trafficking activity for the purpose of avoiding detection and ensuring the success of the criminal organization; and

j. to distribute controlled substances in interstate commerce.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 846 and Title 18, United States Code, Section 2.

COUNT TWO

*Conspiracy to Use, Carry and Possess Firearms in Furtherance of and In Relation to
a Drug Trafficking Crime*

18 U.S.C. § 924(o)

Beginning on a date at least as early as January of 2020, up to and including the return date of this indictment, the precise dates being unknown, in Glynn, Pierce, Camden, Wayne, Treutlen, McIntosh, Toombs, Telfair, Ware Counties, and others within the Southern District of Georgia, and elsewhere, the defendants,

DAVID E. ALVAREZ,
GARRISON A. BELL,
RACHAEL P. BYRD,
SKYLER T. DRAWDY,
JOSHUA E. ENKE,
JUAN C. EVERETTE,
ANDREW R. FLANAGAN,
SHAWN S. GREEN,
a/k/a "Polo Green,"
JOHN E. HARRISON,
a/k/a "Johnny,"
TIMOTHY W. HUTCHINSON,
a/k/a "TIM,"
TIMOTHY W. LOPER,
KENNETH MAINOR,
a/k/a "Busta Bill,"
JUSTIN W. MCGHEE,
CHARLIE A. MOODY,
ANTONIO MORALES,
a/k/a "Silence,"
a/k/a "Silent Ololade,"
AUSTON J. PROCTOR,
JIMMY A. REYNOLDS,
a/k/a "Jim,"
JAMES C. RICHARDSON,
CLINTON TAYLOR,
RONALD E. THOMPSON,
a/k/a "E,"
a/k/a "3D,"
CHARLES W. WALRATH,
a/k/a "Boomer," and,

**JOSHUA T. WOLFE,
a/k/a "White Boy,"
a/k/a "Tom Falier"**

aided and abetted by each other and by others known and unknown, with some joining the conspiracy earlier and others joining later, did knowingly and intentionally combine, conspire, confederate and agree together and with each other, and with others known and unknown to commit an offense against the United States that is to knowingly and unlawfully possess, use, brandish and carry firearms, in furtherance of, and during and in relation to a drug trafficking crime, to wit: conspiracy to possess with the intent to distribute controlled substances, an offense which they can be prosecuted in a Court of the United States, as charged in Count One of this Indictment.

All done in violation of Title 18, United States Code, Sections 924(c) and 924(o), and Title 18, United States Code, Section 2.

COUNT THREE

*Possession of a Controlled Substance with Intent to Distribute
(50 Grams or More of Methamphetamine and 40 Grams or More of Fentanyl)*
21 U.S.C. § 841(a)(1)

On or about July 9, 2020, in Treutlen County, within the Southern District of Georgia, the defendant,

BRIAN T. SPELL,

did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, and 40 grams or more of fentanyl, both Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about November 30, 2020, Glynn County, within the Southern District of Georgia, the defendant,

**SHAWN S. GREEN,
a/k/a “Polo Green,”**

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Taurus 9mm semi-automatic pistol, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIVE

Possession of a Controlled Substance with Intent to Distribute (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about December 1, 2020, in Glynn County, within the Southern District of Georgia, the defendant,

LAURA R. HARDEN,

did knowingly and intentionally possess with intent to distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIX

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about December 13, 2020, Glynn County, within the Southern District of Georgia, the defendant,

CLINTON TAYLOR,

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a SKS 7.62x39 caliber, semi-automatic rifle, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVEN

Distribution of a Controlled Substance (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about January 15, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

WYNDEL L. HERNDON,

did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHT

Distribution of a Controlled Substance (Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about February 19, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

**JONATHAN R. ELROD,
a/k/a “Brazy Jay,”
a/k/a “Jay,”
a/k/a “John Boy,”**

did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINE

Possession of a Controlled Substance with Intent to Distribute (5 Grams or More of Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about March 4, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

**CHARLES W. WALRATH,
a/k/a “Boomer,”**

did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TEN

Possession of a Controlled Substance with Intent to Distribute (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about March 5, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

JOHN D. SCREEN,

did knowingly and intentionally possess with intent to distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ELEVEN

Transfer of a Firearm to a Prohibited Person

18 U.S.C. § 922(d)

On or about March 19, 2021, in, McIntosh County, within the Southern District of Georgia, the defendant,

DAVID E. ALVAREZ,

sold a firearm, to wit, a .25 caliber, semi-automatic pistol, to John Harrison, knowing and having reasonable cause to believe that John Harrison had been convicted of a crime punishable by imprisonment for a term exceeding one year.

All in violation of Title 18, United States Code, Sections 922(d) and 924(a)(2).

COUNT TWELVE

Possession of a Controlled Substance with Intent to Distribute (50 grams or more of Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about April 10, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

**CHARLES W. WALRATH,
a/k/a “Boomer,”**

did knowingly and intentionally possess with intent to distribute 50 grams or more of Methamphetamine, a Schedule II controlled substance, and a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTEEN

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about April 10, 2021, Glynn County, within the Southern District of Georgia, the defendant,

CHARLES W. WALRATH,
a/k/a “Boomer,”

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Smith and Wesson .380 caliber semi-automatic pistol, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOURTEEN

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

18 U.S.C. § 924(c)

On or about April 10, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

**CHARLES W. WALRATH,
a/k/a “Boomer,”**

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Possession of a Controlled Substance with Intent to Distribute, as charged in Count Twelve of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT FIFTEEN

Possession of a Controlled Substance with Intent to Distribute (50 grams or more of Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about April 11, 2021, in Treutlen County, within the Southern District of Georgia, the defendants,

**TERRY L. CASON, II,
and
DAVID D. YOUNG,
a/k/a “Khaos,”**

each being aided and abetted by the other and others, did knowingly and intentionally possess with intent to distribute 50 grams or more of Methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SIXTEEN

Possession of a Controlled Substance with Intent to Distribute (5 grams or more of Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about April 18, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

TIMOTHY W. LOPER,

did knowingly and intentionally possess with intent to distribute 5 grams or more of Methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTEEN

Possession of a Controlled Substance with Intent to Distribute (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about April 21, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

WYNDEL L. HERNDON,

did knowingly and intentionally possess with intent to distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTEEN

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about June 25, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

CHARLES W. WALRATH,
a/k/a “Boomer,”

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETEEN

Possession of a Controlled Substance with Intent to Distribute (5 grams or more of Methamphetamine and a quantity of Morphine)

21 U.S.C. § 841(a)(1)

On or about July 6, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

LAURA R. HARDEN,

did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine, and a quantity of morphine, both Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about July 13, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

CHARLES W. WALRATH,
a/k/a “Boomer,”

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-ONE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about July 27, 2021, in Glynn County, within the Southern District of Georgia, the defendants,

**RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”
and
THEODORE GEE,
a/k/a “Keno,”**

each being aided and abetted by the other and others, did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWENTY-TWO

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about September 9, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

JOHN E. HARRISON,
a/k/a “Johnny,”

did knowingly possess at least one firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Possession of a Controlled Substance with Intent to Distribute, as charged in Count Twenty-Five of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT TWENTY-THREE

Distribution of a Controlled Substance Resulting in Death (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about September 2, 2021, in McIntosh County, within the Southern District of Georgia, the defendant,

JOHN D. SCREEN,

did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance that resulted in the death of Rebecca Elizabeth Cain.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT TWENTY-FOUR

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about September 9, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

**JOHN E. HARRISON,
a/k/a “Johnny,”**

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, firearms and ammunition, to wit, a Rohm, Model GMBH .22 caliber revolver, a Taurus 9mm caliber semi-automatic pistol, a PW Arms, Model P64, 9mm pistol, and ammunition, all of which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-FIVE

*Possession of a Controlled Substance with Intent to Distribute (5 grams or more of
Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about September 9, 2021, in Glynn County, within the Southern District
of Georgia, the defendant,

**JOHN E. HARRISON,
a/k/a “Johnny,”**

did knowingly and intentionally possess with intent to distribute 5 grams or more of
methamphetamine, a Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SIX

Distribution of a Controlled Substance (Heroin)

21 U.S.C. § 841(a)(1)

On or about October 7, 2021, in Toombs County, within the Southern District of Georgia, the defendant,

CORI L. TAYLOR,

did knowingly and intentionally distribute a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-SEVEN

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about October 15, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

**RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-EIGHT

Possession of a Controlled Substance with Intent to Distribute (5 grams or more of Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about October 15, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

**JAMES I. STEPHENS,
a/k/a “Rabbit,”**

did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine, a Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWENTY-NINE

Possession of a Controlled Substance with Intent to Distribute (Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about October 25, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

CAMEREN A. MCDONALD,

did knowingly and intentionally possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(3)

On or about October 25, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

CAMEREN A. MCDONALD,

then being an unlawful user of a controlled substance as defined in Title 21, United States Code, Section 802, and knowing she was a user, did knowingly possess, in and affecting commerce, a firearm, to wit, a Smith and Wesson 9mm caliber semi-automatic pistol, that had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(3).

COUNT THIRTY-ONE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about October 26, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

**RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-TWO

Possession of a Controlled Substance with Intent to Distribute (Fentanyl)
21 U.S.C. § 841(a)(1)

On or about November 1, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

CHARLES W. WALRATH,
a/k/a “Boomer,”

did knowingly and intentionally possess with intent to distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-THREE

Distribution of a Controlled Substance Resulting in Death (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about November 9, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

JOHN D. SCREEN,

did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance that resulted in the death of Michael Logue.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT THIRTY-FOUR

*Possession of a Controlled Substance with Intent to Distribute
(50 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about November 16, 2021, in Treutlen County, within the Southern District of Georgia, the defendant,

**RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”
and
JOHN E. HARRISON,**

each being aided and abetted by the other, did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THIRTY-FIVE

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about November 16, 2021, in Treutlen County, within the Southern District of Georgia, the defendants,

RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”
and
JOHN E. HARRISON,

each being aided and abetted by the other, did knowingly possess a firearm in furtherance of a drug trafficking crime for which he/she may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Possession of a Controlled Substance with Intent to Distribute, as charged in Count Thirty-Four of this Indictment.

All in violation of Title 18, United States Code, Section 924(c) and Title 18, United States Code, Section 2.

COUNT THIRTY-SIX

*Possession of a Controlled Substance with Intent to Distribute
(Methamphetamine and Fentanyl)*

21 U.S.C. § 841(a)(1)

On or about November 17, 2021, in Camden County, within the Southern District of Georgia, the defendant,

JOHN D. SCREEN,

did knowingly and intentionally possess with intent to distribute a quantity of methamphetamine and a quantity of fentanyl, Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-SEVEN

*Possession of a Controlled Substance with Intent to Distribute
(Fentanyl)*

21 U.S.C. § 841(a)(1)

On or about December 15, 2021, in Wayne County, within the Southern District of Georgia, the defendant,

BLAKE K. SCREEN,

did knowingly and intentionally possess with intent to distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT THIRTY-EIGHT

Possession of a Controlled Substance with Intent to Distribute (5 grams or more of Methamphetamine and a quantity of Fentanyl)

21 U.S.C. § 841(a)(1)

On or about January 12, 2022, in Camden County, within the Southern District of Georgia, the defendants,

**AUSTON J. PROCTOR,
and
JASON A. SWEAT,**

each being aided and abetted by the other and others, did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine, and a quantity of fentanyl, both Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT THIRTY-NINE

Possession of a Controlled Substance with Intent to Distribute (50 grams or more of Methamphetamine, Fentanyl and Cocaine)

21 U.S.C. § 841(a)(1)

On or about January 16, 2022, in Camden County, within the Southern District of Georgia, the defendant,

AUSTON J. PROCTOR,

did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, and quantities of fentanyl and cocaine, all Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FORTY

Distribution of a Controlled Substance Resulting in Death (Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about January 18, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**ERIC S. OGDEN,
a/k/a “Scotty,”**

did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance that resulted in the death of Dylan Jones.

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FORTY-ONE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about January 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FORTY-TWO

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about January 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FORTY-THREE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about February 10, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JIMMY A. REYNOLDS,
a/k/a “Jim,”

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FORTY-FOUR

Distribution of a Controlled Substance (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about February 11, 2022, in Pierce County, within the Southern District of Georgia, the defendants,

HEAVEN L. WOLFE,
and
JOSHUA T. WOLFE,
a/k/a “White Boy,”
a/k/a “Tom Walier,”

each being aided and abetted by the other and others, did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FORTY-FIVE

Possession of a Controlled Substance with Intent to Distribute (50 grams or more of Methamphetamine, and Fentanyl)

21 U.S.C. § 841(a)(1)

On or about February 14, 2022, in Pierce County, within the Southern District of Georgia, the defendants,

**CODY M. DEMERS,
a/k/a “Bravo Seven,”
and
JOSHUA T. WOLFE,
a/k/a “White Boy,”
a/k/a “Tom Walier,”**

each being aided and abetted by each other and others, did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, and a quantity of fentanyl, both Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FORTY-SIX

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about February 14, 2022, in Pierce County, within the Southern District of Georgia, the defendant,

**JOSHUA T. WOLFE,
a/k/a “White Boy,”
a/k/a “Tom Walier,”**

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a FMK 9mm caliber semi-automatic pistol, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FORTY-SEVEN

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

18 U.S.C. § 924(c)

On or about February 14, 2022, in Pierce County, within the Southern District of Georgia, the defendants,

**JOSHUA T. WOLFE,
a/k/a “White Boy,”
a/k/a “Tom Walier,
and
HEAVEN L. WOLFE,**

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he/she may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Distribution of a Controlled Substance, as charged in Count Forty-Four of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT FORTY-EIGHT

*Possession with Intent to Distribute a Controlled Substance
(50 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about February 14, 2022, in Pierce County, within the Southern District of Georgia, the defendants,

**JOSHUA T. WOLFE,
a/k/a “White Boy,”
a/k/a “Tom Walier,”
and
HEAVEN L. WOLFE,**

aided and abetted by one another, did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FORTY-NINE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about February 15, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTY

Distribution of a Controlled Substance (Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about February 15, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**JAMES D. WIGGINS,
a/k/a “Brad Jones,”**

did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTY-ONE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about February 15, 2022, in Glynn County, within the Southern District of Georgia, the defendants,

**PRISCILLA HEMINGWAY,
a/k/a “Priscilla Carr,”
and
ERIC S. OGDEN,
a/k/a “Scotty,”**

each being aided and abetted by the other and others, did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FIFTY-TWO

Distribution of a Controlled Substance (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about February 22, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

RONALD E. THOMPSON,
a/k/a “E.,”
a/k/a “3D,”

did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTY-THREE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about February 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**ABRAHAM CREWS,
a/k/a “Abe,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTY-FOUR

Possession of a Controlled Substance with Intent to Distribute (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about March 1, 2022, in Camden County, within the Southern District of Georgia, the defendant,

BRITNEE V. HOUSTON,

did knowingly and intentionally possess with intent to distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTY-FIVE

Possession of Ammunition by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about March 10, 2022, in Camden County, within the Southern District of Georgia, the defendant,

**KENNETH MAINOR,
a/k/a “Busta Bill,”**

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, .22 caliber ammunition, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FIFTY-SIX

Distribution of a Controlled Substance (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about March 15, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**DEBRA L. STOKES,
a/k/a “Debbie,”**

did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTY-SEVEN

*Possession of a Controlled Substance with Intent to Distribute
(Fentanyl and 5 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about March 15, 2022, in Camden County, within the Southern District of Georgia, the defendant,

**DEBRA L. STOKES,
a/k/a “Debbie,”**

did knowingly and intentionally distribute a quantity of fentanyl, and 5 grams or more of methamphetamine, Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTY-EIGHT

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about March 17, 2022, in Camden County, within the Southern District of Georgia, the defendant,

**RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIFTY-NINE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about March 17, 2022, in Camden County, within the Southern District of Georgia, the defendant,

HANNAH G. CROFT,

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTY

Distribution of a Controlled Substance (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about March 28, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

MICHAEL A. PROVENZANO,

did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTY-ONE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about April 5, 2022, in Camden County, within the Southern District of Georgia, the defendant,

**RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTY-TWO

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about April 14, 2022, in Camden County, within the Southern District of Georgia, the defendant,

**RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTY-THREE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1) (review)

On or about April 19, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

GARRISON A. BELL,

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTY-FOUR

*Possession of a Controlled Substance with Intent to Distribute
(50 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about April 19, 2022, in Glynn County, within the Southern District of Georgia, the defendants,

**GARRISON A. BELL,
and
PRISCILLA HEMINGWAY,
a/k/a “Priscilla Carr,”**

each being aided and abetted by the other and others, did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SIXTY-FIVE

*Possession of a Controlled Substance with Intent to Distribute
(50 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about April 20, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

HANNAH G. CROFT,

did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTY-SIX

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about April 20, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

HANNAH G. CROFT,

knowing she had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Canik 9mm caliber semi-automatic pistol, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SIXTY-SEVEN

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about April 20, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

HANNAH G. CROFT,

did knowingly possess a firearm in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Possession of a Controlled Substance with Intent to Distribute, as charged in Count Sixty-Five of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT SIXTY-EIGHT

*Possession of a Controlled Substance with Intent to Distribute
(Methamphetamine)
21 U.S.C. § 841(a)(1)*

On or about April 27, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**JOHN E. HARRISON,
a/k/a “Johnny,”**

did knowingly and intentionally possess with intent to distribute a quantity of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SIXTY-NINE

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about April 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**JOHN E. HARRISON,
a/k/a “Johnny,”**

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Raven Arms .25 caliber semi-automatic pistol, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT SEVENTY

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about April 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOHN E. HARRISON,
a/k/a “Johnny,”

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Possession of a Controlled Substance with Intent to Distribute, as charged in Count Sixty-Eight of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT SEVENTY-ONE

Distribution of a Controlled Substance (Methamphetamine)

21 U.S.C. § 841(a)(1)

On or about May 4, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTY-TWO

*Possession of a Controlled Substance with Intent to Distribute
(5 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about May 5, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JAMES C. RICHARDSON,

did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTY-THREE

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about May 5, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JAMES C. RICHARDSON,

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Possession of a Controlled Substance with Intent to Distribute, as charged in Count Seventy-Two of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT SEVENTY-FOUR

Transfer of a Firearm to a Prohibited Person

18 U.S.C. § 922(d)

On an exact date unknown but at least between April 25, 2021 and May 5, 2021, in Glynn County, within the Southern District of Georgia, the defendant,

SKYLER T. DRAWDY,

sold a firearm, to wit, Norinco, Model SKS, 7.62 rifle, to John Harrison, knowing and having reasonable cause to believe that John Harrison had been convicted of a crime punishable by imprisonment for a term exceeding one year.

All in violation of Title 18, United States Code, Sections 922(d) and 924(a)(2).

COUNT SEVENTY-FIVE

Distribution of a Controlled Substance (Methamphetamine and Heroin)

21 U.S.C. § 841(a)(1)

On or about May 6, 2022, in Dodge County, within the Southern District of Georgia, the defendant,

CORI L. TAYLOR,

did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance and a quantity of heroin, a Schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTY-SIX

Distribution of a Controlled Substance (Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 6, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTY-SEVEN

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 12, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTY-EIGHT

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 16, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**TONYA C. COX,
a/k/a “Shuge White,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVENTY-NINE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 18, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**TONYA C. COX,
a/k/a “Shuge White,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTY

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 18, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTY-ONE

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about May 19, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

CHARLIE A. MOODY,

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a Mossberg 20 Gauge shotgun, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT EIGHTY-TWO

Receipt or Possession of an Unregistered Firearm

26 U.S.C. § 5861(d)

On or about May 19, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

CHARLIE A. MOODY,

knowing received and possessed a firearm, to wit a Mossberg 20-gauge shotgun, a shotgun with a barrel of less than 18 inches in length, not registered to him in the National Firearms Registration and Transfer Record.

All in violation of Title 26, United States Code, Section 5861(d).

COUNT EIGHTY-THREE

Distribution of a Controlled Substance (Fentanyl)

21 U.S.C. § 841(a)(1)

On or about May 20, 2022, in Glynn County, within the Southern District of Georgia, the defendants,

**MARISSA D. DAVIS,
and
CHARLES W. WALRATH,
a/k/a “Boomer,”**

each being aided and abetted by the other and others, did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT EIGHTY-FOUR

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 20, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**ANDREW R. FLANAGAN,
a/k/a "Drew,"**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTY-FIVE

*Possession of a Controlled Substance with Intent to Distribute
(5 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about May 20, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

DAYTON P. WHATLEY,

did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTY-SIX

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 23, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTY-SEVEN

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 23, 2022, in the vicinity of the T.A. Truck Stop at 185 Dungeness Drive, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTY-EIGHT

Distribution of a Controlled Substance (5 grams or more of Methamphetamine and a quantity of Cocaine)
21 U.S.C. § 841(a)(1)

On or about May 23, 2022, in the vicinity of 325 Palisade Drive, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

did knowingly and intentionally distribute 5 grams or more of methamphetamine, and a quantity of cocaine, both Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT EIGHTY-NINE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 23, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

ALEXA B. FOSTER,
a/k/a “Lexa,”

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETY

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 23, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**TONYA C. COX,
a/k/a “Shuge White,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETY-ONE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 23, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

ANDREW R. FLANAGAN,
a/k/a “Drew,”

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETY-TWO

*Possession of a Controlled Substance with Intent to Distribute
(5 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about May 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

did knowingly and intentionally possess with intent to distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETY-THREE

Possession of a Firearm or Ammunition by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about May 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, ammunition, to wit, Tula 9 mm ammunition, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINETY-FOUR

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about May 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOSHUA E. ENKE,

did knowingly possess a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Possession of a Controlled Substance with Intent to Distribute, as charged in Count Ninety-Two of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT NINETY-FIVE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

ANDREW R. FLANAGAN,
a/k/a “Drew,”

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETY-SIX

*Possession of a Controlled Substance with Intent to Distribute
(50 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about May 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**ANDREW R. FLANAGAN,
a/k/a “Drew,”**

did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT NINETY-SEVEN

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about May 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

ANDREW R. FLANAGAN,
a/k/a “Drew,”

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit, a SCCY 9mm caliber semi-automatic pistol, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT NINETY-EIGHT

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about May 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

ANDREW R. FLANAGAN,
a/k/a “Drew,”

did knowingly possess a firearm in furtherance of at least one drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Possession of a Controlled Substance with Intent to Distribute, as charged in Count Ninety-Six of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT NINETY-NINE

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

ALEXA B. FOSTER,
a/k/a “Lexa,”

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED

Distribution of a Controlled Substance (5 grams or more of Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about May 26, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

**TONYA C. COX,
a/k/a “Shuge White,”**

did knowingly and intentionally distribute 5 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED AND ONE

*Possession of a Controlled Substance with Intent to Distribute
(50 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about May 28, 2022, in Toombs County, within the Southern District of Georgia, the defendant,

**ANTONIO MORALES,
a/k/a “Silence,”
a/k/a “Silent Ololade,”**

did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED AND TWO

Possession of a Firearm by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about May 28, 2022, in Toombs County, within the Southern District of Georgia, the defendant,

ANTONIO MORALES,
a/k/a “Silence,”
a/k/a “Silent Ololade,”

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, firearms and ammunition, to wit, one Glock 32C, .357 caliber pistol, one Black Diamond Back DB15, AR-pistol with two 60-round magazines, one Glock 38, .45 caliber pistol, one Beretta .25 caliber pistol, and one Ruger P93DC 9mm pistol, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT ONE HUNDRED AND THREE

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(3)

On or about May 28, 2022, in Toombs County, within the Southern District of Georgia, the defendant,

**ANTONIO MORALES,
a/k/a “Silence,”
a/k/a “Silent Ololade,”**

then being an unlawful user of a controlled substance as defined in Title 21, United States Code, Section 802, and knowing he was a user, did knowingly possess, in and affecting commerce, firearms and ammunition, to wit, one Glock 32C, .357 caliber pistol, one Black Diamond Back DB15, AR-pistol with two 60-round magazines, one Glock 38, .45 caliber pistol, one Beretta .25 caliber pistol, and one Ruger P93DC 9mm pistol, that had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(3).

COUNT ONE HUNDRED AND FOUR

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about May 28, 2022, in Toombs County, within the Southern District of Georgia, the defendant,

**ANTONIO MORALES,
a/k/a “Silence,”
a/k/a “Silent Ololade,”**

did knowingly possess at least one firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Possession of a Controlled Substance with Intent to Distribute, as charged in Count One Hundred and One of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

COUNT ONE HUNDRED AND FIVE
Distribution of a Controlled Substance (Fentanyl)
21 U.S.C. § 841(a)(1)

On or about May 31, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

MICHAEL A. PROVENZANO,

did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED AND SIX

*Possession of a Controlled Substance with Intent to Distribute
(50 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about June 10, 2022, in Glynn County, on Blythe Island, within the
Southern District of Georgia, the defendant,

**RACHAEL P. BYRD,
a/k/a “Byrd is the Word,”
a/k/a “Rachael NeSmith,”**

did knowingly and intentionally possess with intent to distribute 50 grams or more
of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED AND SEVEN

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(3)

Beginning at a time unknown, until on or about June 10, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JUAN C. EVERETTE,
a/k/a “Don Juan,”

then being an unlawful user of a controlled substance as defined in Title 21, United States Code, Section 802, and knowing he was a user, did knowingly possess, in and affecting commerce, firearms and ammunition, to wit, a Sig Sauer .357 caliber pistol and .357 caliber ammunition, that had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(3).

COUNT ONE HUNDRED AND EIGHT
Possession of Ammunition by a Prohibited Person
18 U.S.C. § 922(g)(1)

On or about June 28, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JOHN E. HARRISON,
a/k/a “Johnny,”

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, 9mm caliber ammunition, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT ONE HUNDRED AND NINE

Possession of a Firearm by a Prohibited Person

18 U.S.C. § 922(g)(1)

On or about July 23, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

JIMMY A. REYNOLDS,
a/k/a “Jim,”

knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a Taurus .357 caliber pistol, which had been transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT ONE HUNDRED AND TEN

*Possession of a Controlled Substance with Intent to Distribute
(Fentanyl)*

21 U.S.C. § 841(a)(1)

On or about July 28, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

STEPHANIE L. STOVER,

did knowingly and intentionally possess with intent to distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED AND ELEVEN
Distribution of a Controlled Substance (Fentanyl)
21 U.S.C. § 841(a)(1)

On or about August 2, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

TAYLOR D. DREW,

did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED AND TWELVE
Distribution of a Controlled Substance (Fentanyl)
21 U.S.C. § 841(a)(1)

On or about August 5, 2022, in Glynn County, within the Southern District of Georgia, the defendants

TAYLOR D. DREW,
and
STEPHANIE L. STOVER,

each being aided and abetted by the other and others, did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED AND THIRTEEN
Distribution of a Controlled Substance (Fentanyl)
21 U.S.C. § 841(a)(1)

On or about August 25, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

TAYLOR D. DREW,

did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED AND FOURTEEN
Distribution of a Controlled Substance (Methamphetamine)
21 U.S.C. § 841(a)(1)

On or about September 6, 2022, in Glynn County, within the Southern District of Georgia, the defendants

TAYLOR D. DREW,
and
STEPHANIE L. STOVER,

each being aided and abetted by the other and others, did knowingly and intentionally distribute a quantity of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT ONE HUNDRED AND FIFTEEN

*Possession of a Controlled Substance with Intent to Distribute
(50 grams or more of Methamphetamine)*

21 U.S.C. § 841(a)(1)

On or about September 12, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

WINDELL MCCLAIN,

did knowingly and intentionally possess with intent to distribute 50 grams or more of methamphetamine, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED AND SIXTEEN
Distribution of a Controlled Substance (Fentanyl)
21 U.S.C. § 841(a)(1)

On or about September 27, 2022, in Glynn County, within the Southern District of Georgia, the defendant,

TAYLOR D. DREW,

did knowingly and intentionally distribute a quantity of fentanyl, a Schedule II controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED AND SEVENTEEN

*Possession of Controlled Substances with Intent to Distribute
(Methamphetamine & Fentanyl)*

21 U.S.C. § 841(a)(1)

On or about October 21, 2022, in Camden County, within the Southern District of Georgia, the defendant,

MARISSA D. DAVIS,

did knowingly and intentionally possess with intent to distribute, a quantity of fentanyl and a quantity of methamphetamine, both Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a)(1).

COUNT ONE HUNDRED AND EIGHTEEN

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)

On or about January 16, 2022, in Camden County, within the Southern District of Georgia, the defendant,

AUSTON J. PROCTOR,

did knowingly possess firearms in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, to wit: Conspiracy to Possess with Intent to Distribute and to Distribute a Controlled Substance, as charged in Count One of this Indictment, and Possession of a Controlled Substance with Intent to Distribute, as charged in Count Thirty-Nine of this Indictment.

All in violation of Title 18, United States Code, Section 924(c).

FORFEITURE ALLEGATIONS

The allegations contained in Counts One through One Hundred and Eighteen of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d), Title 49, United States Code, Section 80303, Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c).

Pursuant to Title 21, United States Code, Section 853, upon conviction for any offense in violation of Title 21, United States Code set forth in this Indictment, Defendants:

**DAVID E. ALVAREZ,
GARRISON A. BELL,
DESIREE M. BRILEY,
RACHAEL P. BYRD,
a/k/a "Byrd is the Word,"
a/k/a "Rachael NeSmith,"
TERRY L. CASON, II,
TONYA C. COX,
a/k/a Shuge White,"
ABRAHAM CREWS,
a/k/a "Abe,"
HANNAH G. CROFT,
MICHAEL S. DANIELS,
MARISSA D. DAVIS,
WILLIE H. DAY,
ASHLEY DEEN,
CODY M. DEMERS,
a/k/a "Bravo Seven,"
SKYLER T. DRAWDY,
TAYLOR D. DREW,
JOSHUA A. DRURY,
JONATHAN R. ELROD,
a/k/a "Brazy Jay,"
a/k/a "Jay,"
a/k/a "John Boy,"**

JOSHUA E. ENKE,
JUAN C. EVERETTE,
a/k/a "Don Juan,"
ANDREW R. FLANAGAN,
a/k/a "Drew,"
VERDALEE D. FLANAGAN,
a/k/a "Verlee,"
ALEXA B. FOSTER,
a/k/a "Lexa,"
THEODORE GEE,
a/k/a "Keno,"
CHAD L. GOOGE,
SHAWN S. GREEN,
a/k/a "Polo Green,"
LAURA R. HARDEN,
JOHN E. HARRISON,
a/k/a "Johnny,"
PRISCILLA HEMINGWAY,
a/k/a "Priscilla Carr,"
WYNDEL L. HERNDON,
BRITNEE V. HOUSTON,
TIMOTHY W. HUTCHINSON,
a/k/a "Tim,"
KENNETH W. LANE,
a/k/a "Skinny,"
TIMOTHY W. LOPER,
KENNETH MAINOR,
a/k/a "Busta Bill,"
KENYETTA D. MAINOR,
a/k/a "Yatta,"
WINDELL MCCLAIN,
CAMEREN A. MCDONALD,
JUSTIN W. MCGHEE,
CHARLIE A. MOODY,
ANTONIO MORALES,
a/k/a "Silence,"
a/k/a "Silent Ololade,"
AUBREY NESMITH,
JAMES D. NESMITH,
a/k/a "DG,"
MARY NESMITH,
ERIC S. OGDEN,
a/k/a "Scotty,"
AUSTON J. PROCTOR,

MICHAEL A. PROVENZANO,
JIMMY A. REYNOLDS,
a/k/a "Jim,"
JAMES C. RICHARDSON,
WILLIAM M. RINGLE,
a/k/a "Will,"
ANTHONY D. RUFFNER,
SAMANTHA S. RUSSELL,
JAMEY E. SAPP,
BLAKE K. SCREEN,
JOHN D. SCREEN,
ADAM H. SMITH,
BRIAN T. SPELL,
GREGORY W. STABILE,
a/k/a "G,"
a/k/a "Lts Be DAreason,"
JAMES I. STEPHENS,
a/k/a "Rabbit,"
DEBRA L. STOKES,
a/k/a "Debbie,"
STEPHANIE L. STOVER,
JASON A. SWEAT,
CLINTON TAYLOR,
CORI L. TAYLOR,
LARRY B. TAYLOR,
a/k/a "Lee Lee,"
CHRISTOPHER J. THOMPSON,
RONALD E. THOMPSON,
a/k/a "E.,"
a/k/a "3D,"
JESSE J. TRUJILLO,
CHARLES W. WALRATH,
a/k/a "Boomer,"
DAYTON P. WHATLEY,
DAVID NICHOLAS WHEELER,
DAKOTA L. WHITE,
JAMES D. WIGGINS,
a/k/a "Brad Jones,"
JEREMY D. WIX,
HEAVEN L. WOLFE,
JOSHUA T. WOLFE,
a/k/a "White Boy,"
a/k/a "Tom Walier," and,
DAVID D. YOUNG,

a/k/a “Khaos,”

shall forfeit to the United States any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part to commit, or to facilitate the commission of, the offense(s), including but not limited to:

1. \$53,516.00 in U.S. Currency seized on or about January 16, 2022.

Upon conviction of any offense alleged in this Indictment, the above-named defendants shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c) any firearm, ammunition, and other property, involved in that offense, including but not limited to:

1. Smith & Wesson, .380 caliber pistol, S/N REA2045;
2. Taurus, GC2, 9mm pistol, S/N ACE870694;
3. PW Arms, P64, 9mm pistol, S/N BB02730;
4. Rohm, GMBH, .22 caliber revolver S/N 63961;
5. One handgun part (hammer from .22 caliber revolver);
6. A silver Raven Arms, .25 caliber pistol, S/N 1153428;
7. A black Smith & Wesson, M&P, 9mm pistol, S/N NJR2921;
8. A black Taurus Millennium, 9mm handgun, S/N T159278;
9. \$53,516.00 in U.S. currency;
10. Glock, 42, .380 pistol S/N AWC808;
11. Assorted ammunition;

12. Sig Sauer, P226, .40 caliber pistol, S/N U682537;
13. Glock M23, S/N BCLC293;
14. Glock, 20 Gen 4, S/N BNNT725;
15. Glock, 43X, 9mm pistol, S/N BTFS474;
16. Glock, 23, .40 caliber pistol, S/N BCLC293;
17. Colt, .380 special, 38 caliber revolver S/N RA553278;
18. Colt, Cobra, .357 Magnum revolver, S/N RA233980;
19. Colt, Cobra, .32 caliber revolver, S/N 16508;
20. Rossi, .22 caliber pistol, S/N 305888;
21. Smith & Wesson, 357 magnum, .357 caliber revolver, S/N CUZ2266;
22. Smith & Wesson, M&P 45, .45 caliber pistol, S/N MPR5917;
23. Colt, Cobra, .38 special revolver, S/N RA553278;
24. Browning, Buck Mark, .22LR pistol, S/N BRUS02541YN515;
25. KelTec, Sub 2000, .22 caliber rifle, S/N FG6A23;
26. Magpaul, ZEV-FL, multi-caliber rifle, S/N ZFL05262;
27. Arsenal, 7.6x39 caliber rifle, S/N SAM75F;
28. Andro Corp, ACI-15, multi-caliber rifle, S/N JJ00436;
29. FN SCAR, 17S, 7.6x39 caliber rifle, S/N HOC23938;
30. A 2018 Chevrolet Silverado bearing VIN 3GCUKSEJ9JG348269;
31. FMK, 9mm pistol, S/N BTT2584;
32. Taurus, G3C, 9mm pistol, S/N ACE934259;
33. A black Century Arms, TP9, 9mm pistol, S/N T6472-18BH04709;

34. Sig Sauer, SP2002, .40 caliber pistol, S/N 24B387868;
35. A black Glock, 19, 9mm handgun, S/N obliterated;
36. A black Maverick Arms, 88, 20-gauge shotgun, S/N MV0607597;
37. RG Industries Rg14, .22 caliber revolver with black tape grip;
38. A teal/gray SCCY, CPX-1, 9mm pistol, S/N 928760;
39. A sawed-off Mossberg 20-gauge shotgun, model 88, S/N MV36200P;
40. A black Diamond Back DB15 AR-pistol, S/N DB2002263;
41. A black Glock 32C, .357 caliber pistol, S/N FMK847;
42. A black Glock 38, .45 caliber pistol, S/N BNGV939;
43. A black Berretta, 950BS, .25 caliber pistol, S/N BER89624V;
44. A silver/gray Ruger, P93DC, 9mm pistol, S/N 306-04187;
45. A silver and black Smith & Wesson, 9mm pistol, S/N FCV6388;
46. Mossberg 12 gauge shotgun, 500, S/N K145413; and
47. Walther P22, .22 caliber pistol, S/N L321714.

Upon conviction of the offense alleged in Count Eighty-Two in this Indictment, defendant **CHARLIE A. MOODY** shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), Title 49, United States Code, Section 80303, Title 26, United States Code, Section 5872, and Title 28, United States Code, Section 2461(c) any firearm involved in that offense, including but not limited to: a sawed-off Mossberg 20-gauge shotgun, model 88, S/N MV36200P.

If any of the property described above, as a result of any act or commission of the defendant:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the court;
- d) has been substantially diminished in value; or
- e) has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).

A True Bill



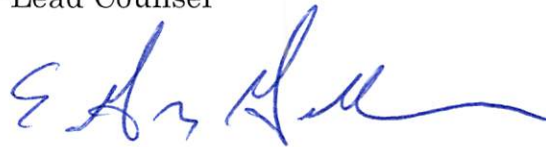
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